

DENNIS L. KENNEDY
Nevada Bar No. 1462
JOSHUA P. GILMORE
Nevada Bar No. 11576
TAYLER D. BINGHAM
Nevada Bar No. 15870
BAILEY♦KENNEDY
8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148-1302
Telephone: 702.562.8820
Facsimile: 702.562.8821
DKennedy@BaileyKennedy.com
JGilmore@BaileyKennedy.com
TBingham@BaileyKennedy.com

Attorneys for Defendants
NGAN VAN LE, INDIVIDUALLY AND AS
TRUSTEE FOR THE AD VITAM AUT
CULPAM TRUST; JML HOLDINGS, LLC;
AND JML SURGICAL CENTER, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOCELYNE R. UY, an individual; and
WESTLEY U. VILLANUEVA, an individual.

Plaintiffs.

VS.

SANDY VAN, an individual; NGAN VAN LE, an individual; SANDY VAN, LLC dba VAN LAW FIRM, a Nevada Domestic Limited Liability Company; VAN AND ASSOCIATES LAW FIRM, PLLC, a Nevada Professional Limited Liability Company; JML HOLDINGS, LLC, a Nevada Domestic Limited-Liability Company; NGAN VAN LE as Trustee for the AD VITAM AUT CULPAM TRUST; JML SURGICAL CENTER, LLC, a Nevada Domestic Limited-Liability Company; DOES I through X; and ROE CORPORATIONS 1 through X, inclusive.

Defendants.

Case No. 2:24-cv-00599-GMN-DJA

**STIPULATION AND ORDER EXTENDING
DEADLINE FOR RESPONSES TO THE
SECOND AMENDED COMPLAINT [ECF
NO. 31]**

(FIRST REQUEST)

Defendants, Sandy Van, Sandy Van, LLC dba Van Law Firm, and Van and Associates Law Firm, PLLC (collectively, the “Van Defendants”), by and through their counsel; Defendants, Ngan Van Le, individually and as Trustee for the Ad Vitam Aut Culpam Trust, JML Holdings, LLC, and

1 JML Surgical Center, LLC (collectively, the “Le Defendants”), by and through their counsel; and
2 Plaintiffs, Jocelyne R. Uy and Westley U. Villanueva (together, “Plaintiffs”), by and through their
3 counsel, hereby stipulate and agree as follows:

4 1. On February 19, 2025, Plaintiffs filed their Second Amended Complaint and Jury
5 Demand Against All Defendants [ECF No. 31].

6 2. Presently, the Van Defendants and the Le Defendants each have until March 5, 2025,
7 to respond to the Second Amended Complaint.

8 3. Due to work-related scheduling conflicts, including several expert reports, motion
9 practice, depositions and associated preparation sessions, and an Amended Joint Pretrial Order
10 (among other tasks), and personal conflicts for the Le Defendants’ counsel, including a family
11 vacation, and as a matter of professional courtesy extended by Plaintiffs’ counsel, the Van
12 Defendants and the Le Defendants shall each have until March 26, 2025, to respond to Plaintiffs’
13 Second Amended Complaint.

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BAILEY♦KENNEDY
8984 SPANISH RIDGE AVENUE
LAS VEGAS, NEVADA 89143-1302
702.562.8820

1 4. This is the first request to extend the deadline for responding to the Second Amended
 2 Complaint and is made in good faith and not for purposes of delay.

3 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

4
 5 Dated this 3rd day of March, 2025.

6 BAILEY♦KENNEDY

7 By: /s/ Joshua P. Gilmore

8 DENNIS L. KENNEDY
 9 JOSHUA P. GILMORE
 10 TAYLER D. BINGHAM

11 *Attorneys for Defendants*

12 NGAN VAN LE, INDIVIDUALLY AND AS
 13 TRUSTEE FOR THE AD VITAM AUT
 14 CULPAM TRUST; JML HOLDINGS, LLC;
 15 AND JML SURGICAL CENTER LLC

16 Dated this 3rd day of March, 2025.

17 WILSON, ELSER, MOSKOWITZ, EDELMAN
 18 & DICKER LLP

19 By: /s/ Sheri M. Thome

20 SHERI M. THOME (Bar No. 8657)
 21 NICHOLAS F. ADAMS (Bar No. 14813)

22 *Attorneys for Defendants*

23 SANDY VAN; SANDY VAN, LLC DBA
 24 VAN LAW FIRM; AND VAN AND
 25 ASSOCIATES LAW FIRM, PLLC

26 Dated this 3rd day of March, 2025.

27 JEPSEN LAW, PLLC

28 By: /s/ Kendra Jepsen

29 KENDRA JEPSEN (Bar No. 14065)

30 *Attorneys for Plaintiffs*

31 JOCELYN R. UY AND WESTLEY U.
 32 VILLANUEVA

33 Dated this 3rd day of March, 2025.

34 BLACK & WADHAMS

35 By: /s/ Silvia U. Villanueva

36 SILVIA U. VILLANUEVA (Bar No. 13608)

37 *Attorneys for Plaintiffs*

38 JOCELYN R. UY AND WESTLEY U.
 39 VILLANUEVA

40 **IT IS SO ORDERED.**

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